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FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF LOS ANGELES

SEP 16 2013

JOHN A. JOHNSON, CLERK
BY L. JOHNSON, DEPUTY

JOSEPH M. LOVRETOVICH, STATE BAR NO. 73403
D. AARON BROCK, STATE BAR NO. 241919
BRADLEY J. BENHAM, STATE BAR NO. 277327

Attorneys for Plaintiff

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES - CENTRAL DISTRICT**

JANE DOE, an individual,
Plaintiff,
vs.
CITY OF LOS ANGELES, a
governmental entity;
JOHN LEE, an individual; and
DOES 1-50, inclusive,
Defendants.

Case No.: **BC521591**
D30 Barbara Schepers
COMPLAINT FOR:

1. DISCRIMINATION IN VIOLATION OF THE FEHA;
2. HARASSMENT IN VIOLATION OF THE FEHA;
3. RETALIATION IN VIOLATION OF THE FEHA;
4. FAILURE TO PREVENT IN VIOLATION OF THE FEHA; and
5. WRONGFUL TERMINATION IN VIOLATION OF THE FEHA.

DEMAND FOR JURY TRIAL

Plaintiff JANE DOE hereby brings her employment complaint against the above named Defendants and states and alleges as follows:

CIT/CASE: BC521591
LEA/DEF#: _____
RECEIPT #: CCH09933109
DATE PAID: 09/16/13 03:11 PM
PAYMENT: \$435.00
RECEIVED: 310
CHECK: \$435.00
CASH: \$0.00
CHANGE: \$0.00
CARD: \$0.00

COMPLAINT

JML LAW
A Professional Law Corporation
5941 Varrel Avenue
Woodland Hills, CA 91367

09/16/2013

THE PARTIES

1
2 1. At all times mentioned herein, Plaintiff JANE DOE was a resident of the State of
3 California. Plaintiff was a victim of sexual harassment. She, therefore, files this complaint as
4 "Jane Doe" to protect her identity in this public filing.

5 2. At all times mentioned herein, Defendant CITY OF LOS ANGELES was a
6 California governmental entity. At the time the causes of action arose, Defendant CITY OF LOS
7 ANGELES was Plaintiff's employer.

8 3. At all times mentioned herein, Defendant JOHN LEE was a resident of the State of
9 California. At the time the causes of action arose, Defendant JOHN LEE was Plaintiff's
10 supervisor at Defendant CITY OF LOS ANGELES.

11 4. The true names and capacities, whether individual, corporate, associate or otherwise
12 of DOES 1 through 50 are unknown to Plaintiff who therefore sues these defendants under said
13 fictitious names. Plaintiff is informed and believes that each of the defendants named as a Doe
14 defendant is legally responsible in some manner for the events referred to in this Complaint, is
15 either negligently, willfully, wantonly, recklessly, tortiously, strictly liable, statutorily liable or
16 otherwise, for the injuries and damages described below to this Plaintiff. Plaintiff will in the
17 future seek leave of this court to show the true names and capacities of these Doe defendants
18 when it has been ascertained.

19 5. Plaintiff is informed and believes, and based thereon alleges, that each defendant
20 acted in all respects pertinent to this action as the agent of the other defendants, carried out a
21 joint scheme, business plan or policy in all respects pertinent hereto, and the acts of each
22 defendant are legally attributable to the other defendants.

23 6. Hereinafter in the Complaint, unless otherwise specified, reference to a Defendant or
24 Defendants shall refer to all Defendants, and each of them.

ALLEGATIONS

25
26 7. Plaintiff was employed by Defendant City of Los Angeles from on or about February
27 13, 2012 until on or about April 19, 2013.
28

1 8. Plaintiff worked as a Field Deputy for Defendant City of Los Angeles
2 Councilmember Mitchell Englander, Council District 12. She was a good employee who
3 performed her job duties in an exemplary fashion.

4 9. Throughout Plaintiff's employment, Defendant John Lee, the chief of staff of
5 Councilmember Englander's District 12 office, repeatedly made inappropriate and offensive
6 jokes and comments of a sexual nature in front of and directed to Plaintiff. Among other things,
7 Defendant Lee questioned Plaintiff about her sex life, and repeatedly asked if Plaintiff's older
8 boyfriend could "get a hard on," referring to him as "ED" (erectile dysfunction). Defendant Lee
9 also commented on Plaintiff's body and asked if she was bulimic. In addition, Defendant Lee
10 made jokes to Plaintiff about her "making out" with other female office staff, and told her, "I
11 know you want me."

12 10. The sexual comments were rampant and they encouraged other employees to engage
13 in similar inappropriate behavior. For instance, on one occasion, Plaintiff caught a co-worker
14 looking up Plaintiff's skirt while she was walking up a flight of stairs. Instead of reprimanding
15 the employee, Defendant Lee broke out in laughter.

16 11. Plaintiff frequently complained that the sexual comments and jokes were
17 inappropriate but Defendant Lee never stopped engaging in the offensive behavior. Instead,
18 Defendant Lee patronized Plaintiff and accused her of overreacting.

19 12. In addition to this harassment, Defendants also discriminated against Plaintiff on
20 account of her sex and/or gender. Plaintiff was paid less than her male colleagues. She was also
21 not allowed to go to many business functions because "females were not allowed."

22 13. Then, in 2013, Plaintiff asked to apply to be a Public Safety Deputy. Defendant Lee
23 refused to even consider Plaintiff because he would only hire a white male for the position.
24 Defendant Lee told Plaintiff that could not hire her because the pubic demanded a male for the
25 position and Plaintiff was just a "petite pretty girl." In fact, he told her that he was unsure what
26 kind of jobs Plaintiff could do because of her sex and/or gender.

27 14. Plaintiff complained to Councilmember Englander about the discriminatory
28 behavior. In response, the Councilmember questioned whether Plaintiff only wanted to be a

Public Safety Deputy so she could walk into the fire stations and be naked in front of the male firefighters, and made other inappropriate comments. After these comments, Plaintiff knew the discriminatory and harassing conduct was so engrained within District 12 staff that it would never stop. Therefore, Plaintiff had no choice but to constructively terminate her employment to end the harassing and discriminatory conduct.

EXHAUSTION OF ADMINISTRATIVE REMEDIES

15. On September 3 and 6, 2013, Plaintiff filed charges with the State of California, Department of Fair Employment and Housing. The Department of Fair Employment and Housing closed Plaintiff's case in order to allow Plaintiff to pursue her civil remedies under the Fair Employment Housing Act ("FEHA") and issued Plaintiff a right to sue letter the same day.

FIRST CAUSE OF ACTION

DISCRIMINATION IN VIOLATION OF THE FEHA

(Against Defendant CITY OF LOS ANGELES and DOES 1-50)

16. Plaintiff restates and incorporates by this reference as if fully set forth herein paragraphs 1 through 15 of this Complaint.

17. At all times herein mentioned, California Government Code § 12940 et seq., the Fair Employment and Housing Act ("FEHA"), was in full force and effect and was binding on Defendants, as Defendants regularly employed five or more persons.

18. California Government Code § 12940(a) requires Defendants to refrain from discriminating against any employee on the basis of sex and/or gender.

19. Defendants engaged in unlawful employment practices in violation of the FEHA by discriminating against Plaintiff on account of her sex and/or gender.

20. As a proximate result of the aforesaid acts of Defendants, Plaintiff has suffered actual, consequential and incidental financial losses, including without limitation, loss of salary and benefits, and the intangible loss of employment related opportunities in her field and damage to his professional reputation, all in an amount subject to proof at the time of trial. Plaintiff claims such amounts as damages pursuant to California Civil Code § 3287 and/or § 3288 and/or any other provision of law providing for prejudgment interest.

22. As a proximate result of the wrongful acts of Defendants, Plaintiff has been forced to hire attorneys to prosecute his claims herein, and has incurred and is expected to continue to incur attorneys' fees and costs in connection therewith. Plaintiff is entitled to recover attorneys' fees and costs under California Government Code § 12965(b).

(Against ALL Defendants)

24. The FEHA protects all individuals from harassment based on sex and/or gender. The actions by Defendants, as detailed above, constitutes harassment.

26. As a proximate result of the aforesaid acts of Defendants, Plaintiff has suffered actual, consequential and incidental financial losses, including without limitation, loss of salary and benefits, and the intangible loss of employment related opportunities in her field and damage to his professional reputation, all in an amount subject to proof at the time of trial. Plaintiff

3 1 2 1 3

1 claims such amounts as damages pursuant to California Civil Code § 3287 and/or § 3288 and/or
2 any other provision of law providing for prejudgment interest.

3 27. As a direct and proximate result of Defendants' discriminatory conduct, as alleged
4 herein, Plaintiff has been compelled to retain legal counsel, and is therefore entitled to reasonable
5 attorneys' fees and costs of suit, pursuant to Government Code §§ 12940, 12965 subdivision (b).

6 **THIRD CAUSE OF ACTION**

7 **RETALIATION IN VIOLATION OF THE FEHA**

8 **(Against Defendant CITY OF LOS ANGELES and DOES 1-50)**

9 28. Plaintiff refers to the allegations contained in Paragraphs 1 through 27, inclusive, and
10 incorporates each by reference as though fully set forth at length herein.

11 29. The FEHA protects all individuals from retaliation for engaging in a protected
12 activity. Plaintiff engaged in a protected activity by complaining about the harassing and
13 discrimination conduct directed towards her.

14 30. Thereafter, Defendants retaliated against Plaintiff and escalated the harassment and
15 discriminatory conduct, causing her to constructively terminate her employment.

16 31. Plaintiff is informed and believes, and based thereon alleges, that in addition to the
17 practices enumerated above, defendants, and each of them, have engaged in other retaliatory
18 actions against Plaintiff which are not yet fully known. At such time, as said discriminatory
19 practices become known to her, Plaintiff will seek leave of this Court to amend this Complaint.

20 32. As a direct and proximate result of the acts of Defendants, Plaintiff has and will
21 continue to suffer severe mental anguish and emotional distress in the form of anger, anxiety,
22 embarrassment, headaches, humiliation, loss of sleep, confidence, self-esteem and general
23 discomfort; will incur medical expenses for treatment by psychotherapists and other health care
24 professionals, and other incidental expenses; suffer loss of earnings and other employment
25 benefits and job opportunities. Plaintiff is thereby entitled to general and compensatory damages
26 in an amount according to proof at trial.

27 33. As a proximate result of the aforesaid acts of Defendants, Plaintiff has suffered
28 actual, consequential and incidental financial losses, including without limitation, loss of salary

1 and benefits, and the intangible loss of employment related opportunities in her field and damage
2 to his professional reputation, all in an amount subject to proof at the time of trial. Plaintiff
3 claims such amounts as damages pursuant to California Civil Code § 3287 and/or § 3288 and/or
4 any other provision of law providing for prejudgment interest.

5 34. As a direct and proximate result of Defendants' discriminatory conduct, as alleged
6 herein, Plaintiff has been compelled to retain legal counsel, and is therefore entitled to reasonable
7 attorneys' fees and costs of suit, pursuant to Government Code §§ 12940, 12965 subdivision (b).

8 **FOURTH CAUSE OF ACTION**

9 **FAILURE TO PREVENT IN VIOLATION OF THE FEHA**

10 **(Against CITY OF LOS ANGELES and DOES 1-50)**

11 35. Plaintiff realleges and incorporates herein paragraphs 1 through 34, inclusive, of
12 this Complaint as though fully set forth.

13 36. At all times mentioned herein, California Government Code Sections 12940, et
14 seq., including but not limited to Sections 12940 (j) and (k), were in full force and effect and
15 were binding upon Defendants and each of them. These sections impose on an employer a duty
16 to take immediate and appropriate corrective action to end discrimination and harassment and
17 take all reasonable steps necessary to prevent discrimination and harassment from occurring,
18 among other things.

19 37. Defendants failed to take immediate and appropriate corrective action to end the
20 discrimination and harassment. Defendants also failed to take all reasonable steps necessary to
21 prevent discrimination and harassment from occurring.

22 38. In failing and/or refusing to take immediate and appropriate corrective action to
23 end the discrimination and harassment in failing and/or refusing to take and or all reasonable
24 steps necessary to prevent discrimination and harassment from occurring, Defendants violated
25 California Government Code § 12940 (j) and (k), causing Plaintiff to suffer damages as set forth
26 above.

27 39. As a proximate result of the aforesaid acts of Defendants, and each of them,
28 Plaintiff has suffered actual, consequential and incidental financial losses, including without

1 limitation, loss of salary and benefits, and the intangible loss of employment related
2 opportunities in his field and damage to her professional reputation, all in an amount subject to
3 proof at the time of trial. Plaintiff claims such amounts as damages pursuant to Civil Code §
4 3287 and/or § 3288 and/or any other provision of law providing for prejudgment interest.

5 40. As a proximate result of the wrongful acts of Defendants, and each of them,
6 Plaintiff has suffered and continues to suffer emotional distress, humiliation, mental anguish and
7 embarrassment, as well as the manifestation of physical symptoms. Plaintiff is informed and
8 believes and thereupon alleges that she will continue to experience said physical and emotional
9 suffering for a period in the future not presently ascertainable, all in an amount subject to proof
10 at the time of trial.

11 41. As a proximate result of the wrongful acts of Defendants, and each of them,
12 Plaintiff has been forced to hire attorneys to prosecute his claims herein, and has incurred and is
13 expected to continue to incur attorneys' fees and costs in connection therewith. Plaintiff is
14 entitled to recover attorneys' fees and costs under California Government Code § 12965(b).

15 **FIFTH CAUSE OF ACTION**

16 **WRONGFUL TERMINATION IN VIOLATION OF THE FEHA**

17 **(Against Defendants CITY OF LOS ANGELES and DOES 1-50)**

18 42. Plaintiff realleges and incorporates by reference paragraphs 1 through 41, inclusive,
19 of this Complaint as if fully set forth at this place

20 43. At all times herein mentioned, California Government Code § 12940 et seq. was in
21 full force and effect and were binding on Defendants, as Defendants regularly employed five or
22 more persons.

23 44. Plaintiff's constructive termination is in violation of the FEHA.

24 45. As a proximate result of the aforesaid acts of Defendants, Plaintiff has suffered
25 actual, consequential and incidental financial losses, including without limitation, loss of salary
26 and benefits, and the intangible loss of employment related opportunities in her field and damage
27 to his professional reputation, all in an amount subject to proof at the time of trial. Plaintiff
28

1 claims such amounts as damages pursuant to California Government Code § 3287 and/or § 3288
2 and/or any other provision of law providing for prejudgment interest.

3 46. As a proximate result of the wrongful acts of Defendants, Plaintiff has suffered and
4 continues to suffer emotional distress, humiliation, mental anguish and embarrassment, as well
5 as the manifestation of physical symptoms. Plaintiff is informed and believes, and thereupon
6 alleges, that he will continue to experience said physical and emotional suffering for a period in
7 the future not presently ascertainable, all in an amount subject to proof at the time of trial.

8 47. As a proximate result of the wrongful acts of Defendants, Plaintiff has been forced to
9 hire attorneys to prosecute her claims herein, and has incurred and is expected to continue to
10 incur attorneys' fees and costs in connection therewith. Plaintiff is entitled to recover attorneys'
11 fees and costs under California Government Code § 12965(b).

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1 **WHEREFORE, Plaintiff prays for judgment as follows:**

- 2 1. For general damages in an amount within the jurisdictional limits of this Court;
- 3 2. For special damages according to proof;
- 4 3. For attorneys' fees, according to proof;
- 5 4. For prejudgment interest, according to proof;
- 6 5. For costs of suit incurred herein; and
- 7 6. For such other relief and the Court may deem just and proper.

8

9 **DEMAND FOR JURY TRIAL**

10 Plaintiff hereby demands a trial by jury.

11

12

13 DATED: September 10, 2013

JML LAW, A Professional Law Corporation

14

15

16 By: _____

17 JOSEPH M. LOVRETOVICH

18 D. AARON BROCK

19 Attorneys for Plaintiff

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**CIVIL CASE COVER SHEET ADDENDUM AND
STATEMENT OF LOCATION
(CERTIFICATE OF GROUNDS FOR ASSIGNMENT TO COURTHOUSE LOCATION)**

This form is required pursuant to Local Rule 2.0 in all new civil case filings in the Los Angeles Superior Court.

Item I. Check the types of hearing and fill in the estimated length of hearing expected for this case:

JURY TRIAL? ☒ YES CLASS ACTION? ☐ YES LIMITED CASE? ☐ YES TIME ESTIMATED FOR TRIAL 5-7 HOURS/ ☒ DAYS

Item II. Indicate the correct district and courthouse location (4 steps – If you checked "Limited Case", skip to Item III, Pg. 4):

Step 1: After first completing the Civil Case Cover Sheet form, find the main Civil Case Cover Sheet heading for your case in the left margin below, and, to the right in Column **A**, the Civil Case Cover Sheet case type you selected.

Step 2: Check one Superior Court type of action in Column **B** below which best describes the nature of this case.

Step 3: In Column **C**, circle the reason for the court location choice that applies to the type of action you have checked. For any exception to the court location, see Local Rule 2.0.

Applicable Reasons for Choosing Courthouse Location (see Column C below)

- | | |
|--|--|
| 1. Class actions must be filed in the Stanley Mosk Courthouse, central district. | 6. Location of property or permanently garaged vehicle. |
| 2. May be filed in central (other county, or no bodily injury/property damage). | 7. Location where petitioner resides. |
| 3. Location where cause of action arose. | 8. Location wherein defendant/respondent functions wholly. |
| 4. Location where bodily injury, death or damage occurred. | 9. Location where one or more of the parties reside. |
| 5. Location where performance required or defendant resides. | 10. Location of Labor Commissioner Office |

Step 4: Fill in the information requested on page 4 in Item III; complete Item IV. Sign the declaration.

	A Civil Case Cover Sheet Category No.	B Type of Action (Check only one)	C Applicable Reasons - See Step 3 Above
Auto Tort	Auto (22)	<input type="checkbox"/> A7100 Motor Vehicle - Personal Injury/Property Damage/Wrongful Death	1., 2., 4.
	Uninsured Motorist (46)	<input type="checkbox"/> A7110 Personal Injury/Property Damage/Wrongful Death – Uninsured Motorist	1., 2., 4.
Other Personal Injury/Property Damage/ Wrongful Death Tort	Asbestos (04)	<input type="checkbox"/> A6070 Asbestos Property Damage <input type="checkbox"/> A7221 Asbestos - Personal Injury/Wrongful Death	2. 2.
	Product Liability (24)	<input type="checkbox"/> A7260 Product Liability (not asbestos or toxic/environmental)	1., 2., 3., 4., 8.
	Medical Malpractice (45)	<input type="checkbox"/> A7210 Medical Malpractice - Physicians & Surgeons <input type="checkbox"/> A7240 Other Professional Health Care Malpractice	1., 4. 1., 4.
	Other Personal Injury Property Damage Wrongful Death (23)	<input type="checkbox"/> A7250 Premises Liability (e.g., slip and fall)	1., 4.
		<input type="checkbox"/> A7230 Intentional Bodily Injury/Property Damage/Wrongful Death (e.g., assault, vandalism, etc.) <input type="checkbox"/> A7270 Intentional Infliction of Emotional Distress <input type="checkbox"/> A7220 Other Personal Injury/Property Damage/Wrongful Death	1., 4. 1., 3. 1., 4.

SHORT TITLE: DOE v. CITY OF LOS ANGELES ET AL.

CASE NUMBER

Non-Personal Injury/Property
Damage/ Wrongful Death Tort

Employment

Contract

Real Property
Unlawful Detainer

A Civil Case Cover Sheet Category No	B Type of Action (Check only one)	C Applicable Reasons See Step 3 Above
Business Tort (07)	<input type="checkbox"/> A6029 Other Commercial/Business Tort (not fraud/breach of contract)	1., 3.
Civil Rights (08)	<input type="checkbox"/> A6005 Civil Rights/Discrimination	1., 2., 3.
Defamation (13)	<input type="checkbox"/> A6010 Defamation (slander/libel)	1., 2., 3.
Fraud (16)	<input type="checkbox"/> A6013 Fraud (no contract)	1., 2., 3.
Professional Negligence (25)	<input type="checkbox"/> A6017 Legal Malpractice <input type="checkbox"/> A6050 Other Professional Malpractice (not medical or legal)	1., 2., 3. 1., 2., 3.
Other (35)	<input type="checkbox"/> A6025 Other Non-Personal Injury/Property Damage tort	2., 3.
Wrongful Termination (36)	<input checked="" type="checkbox"/> A6037 Wrongful Termination	1., 2., 3.
Other Employment (15)	<input type="checkbox"/> A6024 Other Employment Complaint Case <input type="checkbox"/> A6109 Labor Commissioner Appeals	1., 2., 3. 10.
Breach of Contract/ Warranty (06) (not insurance)	<input type="checkbox"/> A6004 Breach of Rental/Lease Contract (not unlawful detainer or wrongful eviction) <input type="checkbox"/> A6008 Contract/Warranty Breach -Seller Plaintiff (no fraud/negligence) <input type="checkbox"/> A6019 Negligent Breach of Contract/Warranty (no fraud) <input type="checkbox"/> A6028 Other Breach of Contract/Warranty (not fraud or negligence)	2., 5. 2., 5. 1., 2., 5. 1., 2., 5.
Collections (09)	<input type="checkbox"/> A6002 Collections Case-Seller Plaintiff <input type="checkbox"/> A6012 Other Promissory Note/Collections Case	2., 5., 6. 2., 5.
Insurance Coverage (18)	<input type="checkbox"/> A6015 Insurance Coverage (not complex)	1., 2., 5., 8.
Other Contract (37)	<input type="checkbox"/> A6009 Contractual Fraud <input type="checkbox"/> A6031 Tortious Interference <input type="checkbox"/> A6027 Other Contract Dispute(not breach/insurance/fraud/negligence)	1., 2., 3., 5. 1., 2., 3., 5. 1., 2., 3., 8.
Eminent Domain/Inverse Condemnation (14)	<input type="checkbox"/> A7300 Eminent Domain/Condemnation Number of parcels _____	2.
Wrongful Eviction (33)	<input type="checkbox"/> A6023 Wrongful Eviction Case	2., 6.
Other Real Property (26)	<input type="checkbox"/> A6018 Mortgage Foreclosure <input type="checkbox"/> A6032 Quiet Title <input type="checkbox"/> A6060 Other Real Property (not eminent domain, landlord/tenant, foreclosure)	2., 6. 2., 6. 2., 6.
Unlawful Detainer-Commercial (31)	<input type="checkbox"/> A6021 Unlawful Detainer-Commercial (not drugs or wrongful eviction)	2., 6.
Unlawful Detainer-Residential (32)	<input type="checkbox"/> A6020 Unlawful Detainer-Residential (not drugs or wrongful eviction)	2., 6.
Unlawful Detainer- Post-Foreclosure (34)	<input type="checkbox"/> A6020F Unlawful Detainer-Post-Foreclosure	2., 6.
Unlawful Detainer-Drugs (38)	<input type="checkbox"/> A6022 Unlawful Detainer-Drugs	2., 6.

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CASE NUMBER

	A Civil Case Cover Sheet Category No.	B Type of Action (Check only one)	C Applicable Reasons See Step 3 Above
Judicial Review	Asset Forfeiture (05)	<input type="checkbox"/> A6108 Asset Forfeiture Case	2., 6.
	Petition re Arbitration (11)	<input type="checkbox"/> A6115 Petition to Compel/Confirm/Vacate Arbitration	2., 5.
	Writ of Mandate (02)	<input type="checkbox"/> A6151 Writ - Administrative Mandamus <input type="checkbox"/> A6152 Writ - Mandamus on Limited Court Case Matter <input type="checkbox"/> A6153 Writ - Other Limited Court Case Review	2., 8. 2. 2.
	Other Judicial Review (39)	<input type="checkbox"/> A6150 Other Writ /Judicial Review	2., 8.
Provisionally Complex Litigation	Antitrust/Trade Regulation (03)	<input type="checkbox"/> A6003 Antitrust/Trade Regulation	1., 2., 8.
	Construction Defect (10)	<input type="checkbox"/> A6007 Construction Defect	1., 2., 3.
	Claims Involving Mass Tort (40)	<input type="checkbox"/> A6006 Claims Involving Mass Tort	1., 2., 8.
	Securities Litigation (28)	<input type="checkbox"/> A6035 Securities Litigation Case	1., 2., 8.
	Toxic Tort Environmental (30)	<input type="checkbox"/> A6036 Toxic Tort/Environmental	1., 2., 3., 8.
	Insurance Coverage Claims from Complex Case (41)	<input type="checkbox"/> A6014 Insurance Coverage/Subrogation (complex case only)	1., 2., 5., 8.
Enforcement of Judgment	Enforcement of Judgment (20)	<input type="checkbox"/> A6141 Sister State Judgment <input type="checkbox"/> A6160 Abstract of Judgment <input type="checkbox"/> A6107 Confession of Judgment (non-domestic relations) <input type="checkbox"/> A6140 Administrative Agency Award (not unpaid taxes) <input type="checkbox"/> A6114 Petition/Certificate for Entry of Judgment on Unpaid Tax <input type="checkbox"/> A6112 Other Enforcement of Judgment Case	2., 9. 2., 6. 2., 9. 2., 8. 2., 8. 2., 8., 9.
	RICO (27)	<input type="checkbox"/> A6033 Racketeering (RICO) Case	1., 2., 8.
	Other Complaints (Not Specified Above) (42)	<input type="checkbox"/> A6030 Declaratory Relief Only	1., 2., 8.
		<input type="checkbox"/> A6040 Injunctive Relief Only (not domestic/harassment)	2., 8.
		<input type="checkbox"/> A6011 Other Commercial Complaint Case (non-tort/non-complex)	1., 2., 8.
	Miscellaneous Civil Complaints	<input type="checkbox"/> A6000 Other Civil Complaint (non-tort/non-complex)	1., 2., 8.
Miscellaneous Civil Petitions	Partnership Corporation Governance (21)	<input type="checkbox"/> A6113 Partnership and Corporate Governance Case	2., 8.
	Other Petitions (Not Specified Above) (43)	<input type="checkbox"/> A6121 Civil Harassment <input type="checkbox"/> A6123 Workplace Harassment <input type="checkbox"/> A6124 Elder/Dependent Adult Abuse Case <input type="checkbox"/> A6190 Election Contest <input type="checkbox"/> A6110 Petition for Change of Name <input type="checkbox"/> A6170 Petition for Relief from Late Claim Law <input type="checkbox"/> A6100 Other Civil Petition	2., 3., 9. 2., 3., 9. 2., 3., 9. 2. 2., 7. 2., 3., 4., 8. 2., 9.

SHORT TITLE: DOE v. CITY OF LOS ANGELES ET AL.

CASE NUMBER

Item III. Statement of Location: Enter the address of the accident, party's residence or place of business, performance, or other circumstance indicated in Item II., Step 3 on Page 1, as the proper reason for filing in the court location you selected.

REASON: Check the appropriate boxes for the numbers shown under Column C for the type of action that you have selected for this case. <input type="checkbox"/> 1. <input checked="" type="checkbox"/> 2. <input type="checkbox"/> 3. <input type="checkbox"/> 4. <input type="checkbox"/> 5. <input type="checkbox"/> 6. <input type="checkbox"/> 7. <input type="checkbox"/> 8. <input type="checkbox"/> 9. <input type="checkbox"/> 10.			ADDRESS: 200 N. Main Street		
CITY: Los Angeles	STATE: CA	ZIP CODE: 90012			

Item IV. Declaration of Assignment: I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that the above-entitled matter is properly filed for assignment to the Superior courthouse in the Central District of the Superior Court of California, County of Los Angeles [Code Civ. Proc., § 392 et seq., and Local Rule 2.0, subds. (b), (c) and (d)].

Dated: 9/16/13


(SIGNATURE OF ATTORNEY/FILING PARTY)

PLEASE HAVE THE FOLLOWING ITEMS COMPLETED AND READY TO BE FILED IN ORDER TO PROPERLY COMMENCE YOUR NEW COURT CASE:

1. Original Complaint or Petition.
2. If filing a Complaint, a completed Summons form for issuance by the Clerk.
3. Civil Case Cover Sheet, Judicial Council form CM-010.
4. Civil Case Cover Sheet Addendum and Statement of Location form, LACIV 109, LASC Approved 03-04 (Rev. 03/11).
5. Payment in full of the filing fee, unless fees have been waived.
6. A signed order appointing the Guardian ad Litem, Judicial Council form CIV-010, if the plaintiff or petitioner is a minor under 18 years of age will be required by Court in order to issue a summons.
7. Additional copies of documents to be conformed by the Clerk. Copies of the cover sheet and this addendum must be served along with the summons and complaint, or other initiating pleading in the case.

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): D. AARON BROCK SBN: 241919 JML Law, APLC 21052 Oxnard Street, Woodland Hills, CA 91367 TELEPHONE NO.: 818-610-8800 FAX NO.: 818-610-3030 ATTORNEY FOR (Name): Plaintiff, Jane Doe		FOR COURT USE ONLY FILED SUPERIOR COURT OF CALIFORNIA COUNTY OF LOS ANGELES SEP 16 2013 JUDITH A. CLARK <i>[Signature]</i> BY L. JOHNSON, DEPUTY	
SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES STREET ADDRESS: 111 North Hill Street MAILING ADDRESS: 111 North Hill Street CITY AND ZIP CODE: Los Angeles, 90012 BRANCH NAME: Stanley Mosk Courthouse		CASE NUMBER: BC521591 JUDGE: DEPT:	
CASE NAME: DOE v CITY OF LOS ANGELES et al			
CIVIL CASE COVER SHEET <input checked="" type="checkbox"/> Unlimited (Amount demanded exceeds \$25,000) <input type="checkbox"/> Limited (Amount demanded is \$25,000 or less)		Complex Case Designation <input type="checkbox"/> Counter <input type="checkbox"/> Joinder Filed with first appearance by defendant (Cal. Rules of Court, rule 3.402)	

Items 1-6 below must be completed (see instructions on page 2).

1. Check **one** box below for the case type that best describes this case:
- | | | |
|---|--|--|
| Auto Tort
<input type="checkbox"/> Auto (22)
<input type="checkbox"/> Uninsured motorist (46)
Other PI/PD/WD (Personal Injury/Property Damage/Wrongful Death) Tort
<input type="checkbox"/> Asbestos (04)
<input type="checkbox"/> Product liability (24)
<input type="checkbox"/> Medical malpractice (45)
<input type="checkbox"/> Other PI/PD/WD (23)
Non-PI/PD/WD (Other) Tort
<input type="checkbox"/> Business tort/unfair business practice (07)
<input type="checkbox"/> Civil rights (08)
<input type="checkbox"/> Defamation (13)
<input type="checkbox"/> Fraud (16)
<input type="checkbox"/> Intellectual property (19)
<input type="checkbox"/> Professional negligence (25)
<input type="checkbox"/> Other non-PI/PD/WD tort (35)
Employment
<input checked="" type="checkbox"/> Wrongful termination (36)
<input type="checkbox"/> Other employment (15) | Contract
<input type="checkbox"/> Breach of contract/warranty (06)
<input type="checkbox"/> Rule 3.740 collections (09)
<input type="checkbox"/> Other collections (09)
<input type="checkbox"/> Insurance coverage (18)
<input type="checkbox"/> Other contract (37)
Real Property
<input type="checkbox"/> Eminent domain/Inverse condemnation (14)
<input type="checkbox"/> Wrongful eviction (33)
<input type="checkbox"/> Other real property (26)
Unlawful Detainer
<input type="checkbox"/> Commercial (31)
<input type="checkbox"/> Residential (32)
<input type="checkbox"/> Drugs (38)
Judicial Review
<input type="checkbox"/> Asset forfeiture (05)
<input type="checkbox"/> Petition re: arbitration award (11)
<input type="checkbox"/> Writ of mandate (02)
<input type="checkbox"/> Other judicial review (39) | Provisionally Complex Civil Litigation (Cal. Rules of Court, rules 3.400-3.403)
<input type="checkbox"/> Antitrust/Trade regulation (03)
<input type="checkbox"/> Construction defect (10)
<input type="checkbox"/> Mass tort (40)
<input type="checkbox"/> Securities litigation (28)
<input type="checkbox"/> Environmental/Toxic tort (30)
<input type="checkbox"/> Insurance coverage claims arising from the above listed provisionally complex case types (41)
Enforcement of Judgment
<input type="checkbox"/> Enforcement of judgment (20)
Miscellaneous Civil Complaint
<input type="checkbox"/> RICO (27)
<input type="checkbox"/> Other complaint (not specified above) (42)
Miscellaneous Civil Petition
<input type="checkbox"/> Partnership and corporate governance (21)
<input type="checkbox"/> Other petition (not specified above) (43) |
|---|--|--|
2. This case ☐ is ☒ is not complex under rule 3.400 of the California Rules of Court. If the case is complex, mark the factors requiring exceptional judicial management:
- | | |
|--|--|
| a. <input type="checkbox"/> Large number of separately represented parties
b. <input type="checkbox"/> Extensive motion practice raising difficult or novel issues that will be time-consuming to resolve
c. <input type="checkbox"/> Substantial amount of documentary evidence | d. <input type="checkbox"/> Large number of witnesses
e. <input type="checkbox"/> Coordination with related actions pending in one or more courts in other counties, states, or countries, or in a federal court
f. <input type="checkbox"/> Substantial postjudgment judicial supervision |
|--|--|
3. Remedies sought (check all that apply): a. ☒ monetary b. ☒ nonmonetary; declaratory or injunctive relief c. ☒ punitive
4. Number of causes of action (specify): 7
5. This case ☐ is ☒ is not a class action suit.
6. If there are any known related cases, file and serve a notice of related case. (You may use form CM-915.)

Date:

D. AARON BROCK

(TYPE OR PRINT NAME)

(SIGNATURE OF PARTY OR ATTORNEY FOR PARTY)

NOTICE

- Plaintiff must file this cover sheet with the first paper filed in the action or proceeding (except small claims cases or cases filed under the Probate Code, Family Code, or Welfare and Institutions Code). (Cal. Rules of Court, rule 3.220.) Failure to file may result in sanctions.
- File this cover sheet in addition to any cover sheet required by local court rule.
- If this case is complex under rule 3.400 et seq. of the California Rules of Court, you must serve a copy of this cover sheet on all other parties to the action or proceeding.
- Unless this is a collections case under rule 3.740 or a complex case, this cover sheet will be used for statistical purposes only.